

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 15-10338-FDS
)	
3. GERMAN HERNANDEZ ESCOBAR)	
a/k/a "TERIBLE,")	
)	
4. NOE SALVADOR PEREZ VASQUEZ)	
a/k/a "CRAZY,")	
)	
19. JOSE RENE ANDRADE)	
a/k/a "TRISTE,")	
a/k/a "INNOCENTE")	
Defendants)	

**GOVERNMENT’S OPPOSITION TO DEFENDANTS’ MOTION TO
LIMIT EXPERT TESTIMONY**

Defendants German Hernandez Escobar, a/k/a “Terible,” and Noe Salvador Perez Vasquez, a/k/a “Crazy,” and Jose Rene Andrade, a/k/a “Inocente,” each separately filed motions to limit the scope of testimony concerning the history, structure, and organization of MS-13 (*see* Docket Nos. 2071, 2080, & 2113). This topic was briefed and argued extensively before the so-called Group Four trial in November 2017 and the Group Three trial in January-February 2018. None of the defendants’ motions raise any new issues of fact or law. The government intends to follow the guidance provided by the Court concerning the use of this type of testimony at the upcoming Group Two trial.

Wherefore, the government requests that the Court deny the defendants' motions.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Christopher Pohl
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Court's Electronic Court Filing (ECF) system on March 12, 2018, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/ Christopher Pohl
Christopher Pohl
Assistant United States Attorney